

**REMARKS**

**I. Overview**

These remarks are set forth in response to the Final Office Action. As this amendment has been timely filed within the three-month statutory period, neither an extension of time nor a fee is required. Presently, claims 1 through 8 and 10 through 14 are pending in the Patent Application. Claims 1 and 8 are independent in nature. In the Final Office Action, each of claims 1-4, 8 and 10-12 have been rejected under 35 U.S.C. § 102(e) as being anticipated by United States Patent Application Publication 20030007703 by Roylance. Additionally, claims 1, 2 and 7, 8 and 10 have been rejected under 35 U.S.C. § 102(b) as being anticipated by United States Patent No. 6,563,955 to de Quieroz.

Further, claims 6 and 14 have been rejected under 35 U.S.C. § 103(a) as being obvious over de Queiroz in view of U.S. Patent No. 6,055,017 to Shen et al. (Shen), and also over Roylance in view of Shen. Finally, claims 5 and 13 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Roylance in view of Jong Whan Jang et al., "Performance Evaluation of Scene Change Detection Algorithms" (Jang) and also de Queiroz in view of Jang. In response, **Applicant has amended claims 10 through 14 correct a minor typographical error and otherwise respectfully traverse the rejections on the art.**

**II. The Applicant's Invention**

The Applicants have invented a system, method and apparatus for the componentized configuration of a shared application server based upon varying shared application types. In accordance with the present invention, a shared application server

can be configured to interoperate with pluggable image processing logic based upon the requirements of a shared application hosted in the shared application server. Where the hosted shared application requires high fidelity imaging, pluggable image processing logic can be selected to achieve lossless image capturing and compression. By comparison, where the shared application requires high transmission speeds regardless of image fidelity, image processing logic can be selected to achieve high image compression ratios and small image packaging sizes. In this way, the characteristics of the shared application can be considered in configuring the shared application server.

### III. Rejections Under 35 U.S.C. §§ 102(a) and 102(e)

#### A. Characterization of Roylance

Roylance teaches configurable image processing logic for use in image processing devices. The configurable image processing logic of Roylance includes memory and multiple image processing logic modules implementing different image processing algorithms. In particular, the logic modules are selectively configured and operated via communication logic that allows for a variety of different paths through the image processing logic modules to form an applicable image processing pipeline for a given image processing data/task.

#### B. Characterization of de Queiroz

De Querioz discloses a method and apparatus for compressing digital image data to improve the efficiency of serial data transmission. In de Querioz, image transmission is accomplished by providing multiple image processing modules, and then selecting the module that will process the entirety in the most efficient manner, based upon the content of the data contained in the image.

C. Argument

As noted in the Applicants' previous response, in Roylance, image processing logic modules are selected to form an applicable image processing pipeline for a given image processing data/task. Hence, the decision in Roylance in choosing a particular image processing module is based upon image processing data or an image processing task. By comparison, in de Queiroz, an image processing module is selected to achieve optimal serial transmission of data. The Applicants' claims 1 and 8 required different pluggable image processing modules to be selected to meet requirements of a shared application hosted in a shared application host in contrast to the data itself (Roylance) or the serial transmission of data (de Queiroz). Accordingly, claims 1 through 8 and 10 through 14 distinguish over all combinations of Roylance, de Queiroz, Shen and Jung.

Frustratingly, the Examiner failed to address this argument in the Final Office Action and instead chose to recite the identical rejections as set forth in the Non-Final Office Action in an improperly formed Final Office Action. *If the Examiner expects to sustain the foregoing rejections on appeal, the Examiner must point out within the cited art where an image processing module is chosen to meet the requirements of a shared application hosted in a shared application host.*

VI. Conclusion

The Applicants respectfully request the withdrawal of the rejections under 35 U.S.C. §§ 102(b), 102(e) and 103(a) owing to the amended and cancelled claims and the foregoing remarks. The Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes

a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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/Steven M. Greenberg/

Steven M. Greenberg, Reg. No.: 44,725  
Carey, Rodriguez, Greenberg & Paul, LLP  
**Customer No. 46321**